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Department of Energy CORRESPONDENCE  
CONTROLROCKY FLATS FIELD OFFICE  
10808 HIGHWAY 93, UNIT A  
GOLDEN, COLORADO 80403-8200

NOV 13 2002

02-DOE-01631

CORRES. CONTROL  
INCOMING LTR NO.

00788 RF22

DUE DATE  
ACTION

DIST.	LTR	ENC
BOGNAR, E.	X	X
CROCKETT, G.		
DECK, C. A.	X	X
DEGENHART, K.		
DIETER, T. J.		
DIETERLE, S. E.		
FERRERA, D. W.	X	X
FERRI, M. S.		
GERMAIN, A. L.		
GIACOMINI, J. J.		
ISOM, J. H.		
LINDSAY, D. C.	X	X
LONG, J. W.		
MARTINEZ, L. A.	X	X
NAGEL, R. E.	X	X
NORTH, K.		
PARKER, A. M.	X	X
POWERS, K.		
RODGERS, A. D.		
SHELTON, D. C.	X	X
SPEARS, M. S.		
TRICE, K. D.		
TUOR, N. R.	X	X
WILLIAMS, J. L.		
NESTA, S.	X	X
KEHLER, K.	X	X
BROOKS, L.	X	X

COR. CONTROL	X	X
ADMIN. RECORD	X	X
PATS/130		

Reviewed for Addressee  
Corres. Control RFP11/14/02  
Date By

Ref. Ltr. #

DOE ORDER #

5400-1

Mr. Steven H. Gunderson  
Rocky Flats Cleanup Agreement Project Coordinator  
Colorado Department of Public Health and Environment  
4300 Cherry Creek Drive South  
Denver, Colorado 80222-1530

Dear Mr. Gunderson:

Please find enclosed a completed Rocky Flats Cleanup Agreement (RCRA) Standard Operating Protocol (RSOP) for Component Removal, Size Reduction, and Decontamination Notification Form for tents 7-11 for RCRA Units 15 (permitted) and 35 (interim status). This notification is for all activities required in Section 5 of the Component Removal RSOP. Also, this notification provides administrative closure for Tent 7, which has already been demolished. Your concurrence, for demolition of that clean structure, was previously obtained via the consultative process.

Kaiser-Hill Company, LLC, Construction or a decommissioning subcontractor will conduct the work. If a performing contractor does not use decontamination and demolition processes included in the RSOP, an additional notification will be made.

The subcontractor will conduct work in accordance with its work control documentation. The exact methods and process selection will be communicated with the Colorado Department of Public Health and Environment through an active consultation process including weekly project meetings. Questions may be directed to Steve Tower at (303) 966-2133.

Sincerely,

Joseph A. Legare  
Assistant Manager  
for Environment and Stewardship

Enclosure

cc w/o Encl:  
E. Schmitt, OOM, RFFO  
S. Tower, AMP, RFFO  
S. Nesta, K-H RISS Env.  
K. Kehler, K-H RISS D&D  
T. Rehder, USEPA

cc w/ Encl:  
Administrative Record

DOCUMENT CLASSIFICATION  
REVIEW W/AVR REP  
CLASSIFICATION OFFICE



ADMIN RECORD

IA-A-001172

1/9

## RSOP for Component Removal, Size Reduction, and Decontamination Activities Checklist

<b>Project scope:</b> RCRA Unit closure of Units 15 (Permitted) and 35 (Interim Status)			
<b>Facility description:</b> Cargo containers and Tents 8, 9, 10, and 11 (including Permacon inside), located within fenced area on the 904 Pad. Tent 7 (also known as the 902 Pad), located ~250 feet west of the 904 Pad (collectively Unit 15) and the Tent 10 Permacon (Unit 35).			
<b>Description of planned activity(ies):</b> RCRA Unit Closure			
<b>Facility/rooms/sets/areas involved:</b> Unit 15: 23 Cargo Containers, Tents 7 – 11 (including the Tent 11 Permacon). Unit 35: Tent 10 Permacon			
<b>Is RCRA unit closure(s) part of the planned activity?</b>			<input checked="" type="checkbox"/> Yes
<b>If RCRA units are included, attach unit specific information sheets and drawings</b>			<input type="checkbox"/> No
<b>Attach checklists from Appendix A of the RSOP.</b> See RCRA Closure Information document attached.		<b>Component Removal/Size Reduction</b>	
		<b>Decontamination</b>	
<b>RLCR Status</b>	<input checked="" type="checkbox"/>	<b>RLCR complete and concurrence received:</b> for Group A Facilities (included Tents 10 and 11), 5/12/2000, and 904 Pad Closure Project (902 Pad and Tent 7, and 904 Pad and Tents 8 and 9), 1/30/2002.	
	<input type="checkbox"/>	<b>RLCR initiated but incomplete; concurrence anticipated:</b>	
	<input type="checkbox"/>	<b>RLC has not been initiated<sup>1</sup> and is scheduled for initiation on:</b>	
<b>If RLCR is not complete or initiated, what data will be used to plan the work activities?</b>			
<b>Activity requires modification to the ARARs listed in the RSOP.</b>			<input type="checkbox"/> Yes, attach to letter
			<input checked="" type="checkbox"/> No
<b>Attach Administrative Record file requirements for the activity.</b>			
<b>Point of contact for each facility/activity:</b> Pete Swenson (303) 966-7211			
<b>Duration of work activities:</b> 3 months		<b>Anticipated work start:</b> 11/29/02	
<b>Attach schedule for each facility or activity for information purposes.</b> Attached			
<b>Does the activity involve removing contaminated portions of the building shell? Include a description of the activity, contamination levels and controls</b>			<input type="checkbox"/> Yes, LRA consultation and concurrence required
			<input checked="" type="checkbox"/> No

<sup>1</sup> Evaluate using DPP, Sections 1.1.4 and 1.1.5 and the consultative process to implement activities

# **RSOP for Component Removal, Size Reduction, and Decontamination Activities Checklist**

Are there deviations/exceptions to the RSOP for the proposed activity (ies)?											Yes	
										✓	No	
Provide an explanation of deviation/exception to the RSOP: Not applicable												
C. Check the appropriate resulting action box below												
Additional RFCA decision document required (PAM – IM/IRA)												
Major modification to RSOP						Field change to RSOP						
Minor modification to RSOP						LRA consultation						
Activity(ies) will result in the following waste types											Process waste	
										✓	Remediation waste	
TRU	✓	LLW	✓	LLMW		Haz.	✓	Sanitary	✓	Other: recyclable/re-use		
LRA Notification Review Time						14 days, no RCRA unit closure involved						
					✓	30 days, RCRA unit closure involved						

**Administrative Record Requirements for this Activity**

- Final Rocky Flats Cleanup Agreement (RFCA)
- RFETS Decommissioning Program Plan (DPP)
- RFCA Standard Operating Protocol for Component Removal, Size Reduction, and Decontamination Activities
- Reconnaissance Level Characterization Reports: Group A Facilities (included Tents 10 and 11), 5/12/2000, and 904 Pad Closure Project (902 Pad and Tent 7, and 904 Pad and Tents 8 and 9), 1/30/2002.
- Notification Letter and subsequent CDPHE correspondence, if appropriate

## INTRODUCTION

The Rocky Flats Environmental Technology Site's (RFETS) "RFCA Standard Operating Protocol (RSOP) for Facility Component Removal, Size Reduction, and Decontamination Activities, Section 5.0, Revision 0, February 4, 2001" addresses closure of RCRA regulated units.

This document applies to RCRA Unit 15 which includes Tents 8-11 and 23 cargo containers located on the 904 Pad, Tent 7 located on the 902 Pad, the Interim Status Unit 35 which is a Permacon located in Tent 10, and a Permacon located in Tent 11 that was used for chemical repack operations. Complete closure will be accomplished in accordance with one of the closure options outlined in the RSOP (Sections 5.1.1 – 5.1.3).

Activities will be designed to achieve the closure performance standard, protect human health and the environment, and minimize waste. Specific work instructions, with engineering, health and safety, and waste management information, will be developed prior to the start of closure activities. These instructions will be developed in accordance with applicable RFETS policies and procedures.

## SYSTEM HISTORY AND WASTE CHARACTERIZATION

RCRA Unit 15 was originally two units comprised of RCRA Unit 15A - Cargo Containers and 15B the Tents 7 – 11. The unit was combined into Unit 15 and consists of the cargo containers and Tents 7 through 11, all of which are/were used as container storage areas throughout the life of the Unit. The EPA hazardous waste codes that apply to Unit 15 are D001-D043, F001-F009, F027, F039, P001-P205, U001-U012, U014-U039, U041-U053, U055-U064, U066- U099, U101-U103, U105-U138, U140-U174, U176-U194, U196, U197, U200-U211, U213-U223, U225-U228, U234-U240, U243, U244, U246-U249, U271, U278-U280, U328, U353, U359, U364, U367, U372, U373, U387, U389, U394, U395, and U404 based on the contact record between Site representatives and CDPHE, dated June 3, 2002.

The 904 Pad was originally used for storage of pondcrete and saltcrete in tri-walled boxes. The tri-walled boxes were designed for transportation and not long-term storage. However after delays in the ability to ship the waste offsite, in January 1990, Tents 7 –11 were constructed for the controlled storage of this low-level mixed and hazardous waste. In recent history the unit has been used for the storage of a variety of containers including drums and wooden and metal crates.

The Tent 10 Permacon, Interim Status Unit 35, was constructed to stabilize the low-level mixed (LLM) pondcrete and saltcrete wastes. Additionally, in approximately 1999, a Permacon in Tent 11 was incorporated into Unit 15 to repackage chemicals from around the Site.

On February 5, 2001, CDPHE approved a Closure Description Document for Partial Closure of RCRA Interim Status Unit 35. In a contact record with CDPHE, dated July 3, 2001, it was agreed that the modified partial closure work scope would include strip out of the pond sludge reprocessing equipment, packaging of the debris for disposal, and general clean out and decontamination of the Permacon. However, in an email from the project manager, dated July 30, 2002, it is stated that the Permacon was not decontaminated.

Cargo containers 1 through 5 and 29 through 34 were previously relocated to Unit 18.03 with verbal authorization from Mr. Joseph Schieffelin, CDPHE HMWMD. These cargoes will ultimately be closed under the closure of Unit 18.03.

A contact record between the RISS project and CDPHE, dated October 7, 2002, documented the clean closure of Tent 7. This portion of Unit 15 was closed in accordance with Section 5 of the *RSOP for Facility Component Removal, Size Reduction, & Decontamination Activities*, which allows closure of a regulated unit prior to submittal of the required unit specific closure information, through the consultative process and concurrence of the LRA. The contact record invoked 5.1.1, Option 1, which requires that two criteria be met, a review of the Operating record to document no spills or releases and a visual inspection to verify the same. The tent and pad will subsequently be dismantled and removed; and will be managed as sanitary waste.

### **System Boundaries**

The boundary of Unit 15 includes the remaining 23 cargo containers and Tents 8 – 11 all of which are physically located on the 904 asphalt pad, and Tent 7, which is located 250 feet west of the 904 Pad. The cargo containers are considered weather structures with the secondary containment pans inside of the cargoes the actual boundary of the unit (per conversation between S. Nesta, K-H and J. Hindman, CDPHE).

The boundary of Interim Status Unit 35 is the Permacon structure located inside of Tent 10, including any piping inside the Permacon and the ventilation system from the Permacon structure out to the HEPA filter. The HEPA filters and blowers were removed by Material Stewardship for use on the 750 Pad, and will be closed under the closure of that unit.

Please see the attached Figure for the boundaries of the unit.

### **CLOSURE OPTIONS**

#### **Unit 15 – Tents (including Permacon in Tent 11)**

A review of the RCRA Operating Record including weekly inspection logs, ECATS, PATS, and the Spill Occurrence report, indicates that hazardous or low-level mixed waste was spilled to either the asphalt, which served as the secondary containment of the tents from 1991 to 1999, or to secondary containment pans used for liquids after 1999. However, the Operating Record also shows that all spills or releases were collected and cleaned up. The only area of Unit 15, that based on historical documents (in the 1988 timeframe), appears to have experienced spills or releases of pondcrete or saltcrete that were not appropriately cleaned up is the eastern edge of the 904 Pad. A visual inspection of the remainder of the unit's asphalt pad, by RISS Environmental compliance personnel, verified the absence of hazardous or mixed waste stains and/or residuals. A small (5' x 10') area of staining was observed on a tent panel inside Tent 10, immediately north of door 10. A record review and visual inspection was also conducted for the Tent 11 Permacon, used for chemical repackaging, and considered part of Unit 15. There were no records of spills or releases inside the Permacon and the visual inspection verified no stains and/or residuals. Therefore, Unit 15 tents and the Tent 11 Permacon structure will be closed in accordance with Section 5.1.1 of the *RSOP for Facility Component Removal, Size Reduction, & Decontamination Activities*, Option 1, which requires that two criteria be met, a review of the Operating record to document spills or releases were adequately cleaned up and a visual inspection to verify the absence of stains and/or residuals. The tent and the Permacon structures will be removed and disposed of as either LL waste, non-routine sanitary waste or

sold for reuse depending on if the tent and Permacon structures meet the free-release criteria for radiological contamination. Prior to tent removal, the majority of the asphalt pad, immediately under the tents 8-11 will be rinsed with water, the water collected and sampled to confirm the pad is not contaminated with hazardous waste. The collected water will be handled as hazardous until analytical results are obtained. If analyses confirm the asphalt is not contaminated, it will remain in place until Environmental Restoration (ER) conducts soil remediation in this area.

The only exception will be the easternmost edge of the 904 Pad including the asphalt berm, removed along its length (running south to north) for a width of about 5 feet to the west, and the lower section of the tent panel, approximately 5'x10' in Tent 10, at door 10. This portion of the pad and the tent panel will be closed by removal, with the EPA codes for pondcrete and saltcrete applied (F001, F002, F003, F005, F006, F007, and F009). The section of pad that is removed will be replaced by clean asphalt to ensure that any contaminated soil is not exposed to the environment.

#### **Unit 15 – Cargo Containers**

A review of the RCRA Operating Record including weekly inspection logs, ECATS, PATS, and the Spill Occurrence report, indicates that hazardous or low-level mixed waste were spilled to the secondary containment of cargoes 9, 10, 11, and 21 from 1991 to the present. However, the Operating Record also shows that all spills or releases were collected and cleaned up in accordance with site policies and procedures. A visual inspection of the secondary containment pans, by RISS Environmental compliance personnel, verified the absence of hazardous or mixed waste stains and/or residuals. The cargo containers themselves were merely weather structures, and after a radiological release is completed, will be released for reuse or resale through PU&D. Unit 15 cargo containers secondary containment pans will be closed in accordance with Section 5.1.1 of the *RSOP for Facility Component Removal, Size Reduction, & Decontamination Activities*, Option 1, which requires that two criteria be met, a review of the Operating record to document spills or releases were adequately cleaned up and a visual inspection to verify the absence of stains and/or residuals.

#### **Interim Status Unit 35 (Inside Tent 10)**

The Permacon will be closed by unit removal in accordance with section 5.1.3, and will include the Permacon structure and metal flooring, any interior piping and or structures that remain, and the ventilation system exterior to the Permacon up to and including the HEPA filter. The EPA codes for pondcrete and saltcrete will be applied to the waste generated (F001, F002, F003, F005, F006, F007, and F009), and the waste will be disposed of as LL mixed waste. All other exterior structures, including power, heat, and ventilation beyond the HEPA filter, are not considered part of the unit and will be removed using Site procedures for property disposition.

#### **SOIL CONTAMINATION EVALUATION AND POST CLOSURE CARE**

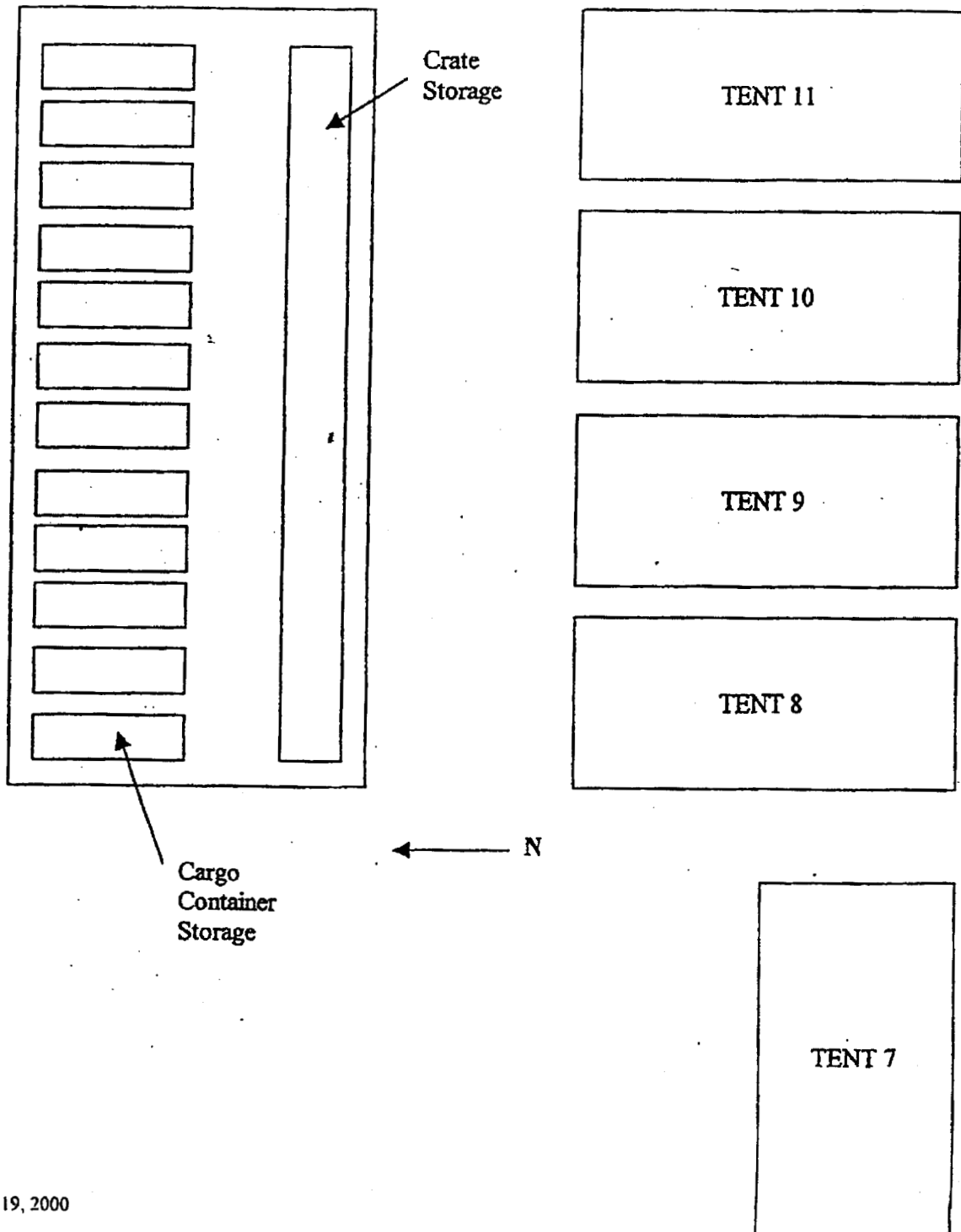
The Historical Release Report indicates radiological contamination of the soil exists due to possible activities conducted prior to the unit's construction. Soil sampling is not planned for activities conducted under this RSOP notification. ER will characterize the area after the 904 Pad tents are removed. Remediation of this site will depend on the characterization results. ER will perform any soil remediation under the *ER RSOP for Routine Soil Remediation*, however it is assumed that this will be a NFA site.

## **RECORDKEEPING**

RCRA unit closure activities will be documented in the Decommissioning Final Closeout Report as opposed to the Pre-Demolition Survey Report (PDSR) which will be completed prior to demolition of the units. When final closure of units 15 and 35 is completed, the Site's Master List of RCRA units will be updated with the closure status and a permit modification will be submitted to remove the units from the RCRA Part A and Part B Permit.



RCRA Unit 15  
(904 Pad)  
Container Storage



9/9  
May 19, 2000